

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

CONTOUR IP HOLDING, LLC and )  
ION WORLDWIDE, INC., )  
Plaintiffs, )  
v. ) C.A. No. 15-1108 (LPS) (CJB)  
GOPRO, INC., )  
Defendant. )

**DEFENDANT GOPRO, INC.'S MOTION TO STAY  
PENDING *INTER PARTES* REVIEW OF THE PATENTS-IN-SUIT**

Defendant GoPro, Inc. (“GoPro”) moves for a stay of this action pending *Inter Partes* Reviews of both patents-in-suit, U.S. Patent No. 8,890,954 and U.S. Patent No. 8,896,694. The grounds for this motion are set forth in GoPro’s opening brief filed concurrently.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

*/s/ Michael J. Flynn*

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February 1, 2016

**CERTIFICATION PURSUANT TO LOCAL RULE 7.1.1**

Pursuant to District of Delaware Local Rule 7.1.1, Defendant GoPro, Inc. (“GoPro”) hereby certifies that a reasonable effort has been made to reach agreement with Plaintiffs Contour IP Holding, LLC and iON Worldwide, Inc. on the matter set forth in GoPro’s Motion to Stay Pending *Inter Partes* Review of the Patents-in-Suit. The parties were unable to reach agreement.

*/s/ Michael J. Flynn*

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Michael J. Flynn (#5333)

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**[PROPOSED] ORDER GRANTING GOPRO, INC.'S MOTION  
TO STAY PENDING *INTER PARTES* REVIEW OF THE PATENTS-IN-SUIT**

WHEREAS, Defendant GoPro, Inc. filed a Motion to Stay Pending Inter Partes Review of the Patents-in-Suit; and

WHEREAS, the Court having considered the respective papers submitted by both parties, in support of, or in opposition to, said motion;

**IT IS HEREBY ORDERED that:**

Defendant GoPro, Inc.'s Motion is GRANTED

Dated: \_\_\_\_\_  
\_\_\_\_\_  
J.

**CERTIFICATE OF SERVICE**

I hereby certify that on February 1, 2016, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on February 1, 2016, upon the following in the manner indicated:

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